

ATTACHMENT 3

Exhibit 1

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15 *Attorneys for Plaintiff Cisco Systems, Inc.*

16 **UNITED STATES DISTRICT COURT**

17 **NORTHERN DISTRICT OF CALIFORNIA**

18 CISCO SYSTEMS, INC.,) CASE NO. 5:14-cv-05344-BLF
19)
20 Plaintiff,)
21 v.)
22 ARISTA NETWORKS, INC.,)
23 Defendant.)
24)
25)
26)
27)
28)

**PLAINTIFF CISCO SYSTEMS, INC.'S
CORRECTED SUPPLEMENTAL
OBJECTIONS AND RESPONSES TO
DEFENDANT ARISTA NETWORKS,
INC.'S INTERROGATORY NOS. 21,
24 & 25**

29 **CONTAINS HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY
30 INFORMATION SUBJECT TO PROTECTIVE ORDER**

1 22. Cisco objects to each interrogatory as premature to the extent it calls for documents
2 or information that is the subject of later disclosure deadlines in this Litigation and/or expert
3 reports and testimony, including as set forth in Rule 26(a)(2) of the Federal Rules of Civil
4 Procedure, the Patent Local Rules of the Northern District of California, and the Case
5 Management Order entered in this Litigation.

6 23. Any Cisco response that it will provide information or produce documents should
7 not be construed to mean that responsive information or documents in fact exist; only that, if such
8 relevant, non-privileged, non-objectionable information or documents exist, are in Cisco's
9 possession, custody, or control, and are located after a reasonable search of the location or
10 locations where responsive information or documents are likely to be located, such information or
11 documents will be produced in a timely manner.

12 24. Cisco further reserves all rights to supplement its responses to Arista's
13 Interrogatories in compliance with the Federal Rules of Civil Procedure, including under Rule
14 26(e), as well as the Civil and Patent Local Rules of the Northern District of California and any
15 orders governing this Litigation, and as Cisco's investigation and discovery proceeds in this
16 Litigation.

RESPONSES TO INTERROGATORIES

18 | INTERROGATORY NO. 21:

19 Identify and describe in detail the factual and legal bases (including an identification of
20 documents, if any, by Bates-stamp number, and witnesses knowledgeable about each fact) for your
21 contention that Arista's alleged use of the asserted aspects of the copyrighted works does not
22 constitute a "fair use" under 17 U.S.C. § 107, including all facts you contend are relevant to each
23 of the following statutory factors:

24 (1) the purpose and character of the use, including whether such use is of a commercial
25 nature or is for nonprofit educational purposes;

26 || (2) the nature of the copyrighted work;

(3) the amount and substantiality of the portion used in relation to the copyrighted work as a whole; and

(4) the effect of the use upon the potential market for or value of the copyrighted work.

RESPONSE TO INTERROGATORY NO. 21:

HIGHLY CONFIDENTIAL—ATTORNEYS' EYES ONLY

Cisco incorporates by reference its General Objections as though fully set forth herein.

Cisco also objects to this interrogatory as compound and unduly burdensome, as it calls for numerous pieces of information and has multiple subparts improperly grouped as a single interrogatory. Cisco further objects to this interrogatory as overbroad and unduly burdensome to the extent that it seeks information that is neither relevant to any claim or defense in this litigation nor reasonably likely to lead to the discoverability of admissible evidence. Cisco also objects to this interrogatory as undefined, vague, ambiguous, overbroad, and unduly burdensome in its use of the term “asserted aspect.” Cisco further objects to this interrogatory to the extent that it is cumulative and duplicative of other discovery sought by Arista. Cisco further objects to this interrogatory to the extent it seeks information that is protected by the attorney-client privilege, that constitutes attorney work product, or that is protected by any other applicable privilege, protection, or immunity. Cisco further objects to this interrogatory because it calls for legal conclusions. Cisco further objects to this interrogatory because Arista bears the burden of proving any “fair use” defense and has thus far failed to identify the facts and legal basis that support such a defense. Cisco further objects to this interrogatory as unduly burdensome in that it seeks to shift to Cisco the burden associated with any Arista attempt to prove a “fair use” defense. Cisco further objects to this interrogatory because it seeks expert opinion and is therefore premature.

24 Subject to and without waiver of the foregoing general and specific objections, Cisco
25 responds as follows:

26 As an affirmative defense, Arista bears the burden of proving any “fair use” defense on
27 which it intends to rely in this case. *Harper & Row*, 471 U.S. 539, 561 (1985). Arista’s responses

1 to Cisco’s Interrogatory Nos. 10 and 12, which seek information concerning Arista’s fair use
 2 defense, however, show that Arista has thus far has failed to come forward in response to
 3 discovery or otherwise with sufficient evidence to support such a defense. As Arista has failed to
 4 sufficiently explain the basis for—let alone prove—any contention that its use of Cisco’s
 5 copyrighted works constitutes a “fair use” under 17 U.S.C. § 107, Arista has failed to meet its
 6 burden and, thus, its fair use defense fails.

7 Cisco further responds as follows:

8 (1) ***the purpose and character of the use, including whether such use is of a
 9 commercial nature or is for nonprofit educational purposes;***

10 17 U.S.C. § 107 provides that fair use “for purposes such as criticism, comment, new
 11 reporting, teaching (including multiple copies for classroom use), scholarship, or research, is not
 12 an infringement of copyright.” Arista, however, does not contend (nor can it) that its use of
 13 Cisco’s copyrighted works is for such purposes.

14 Indeed, Arista’s purpose is the same as Cisco’s purpose, which is a classic superseding use
 15 and not transformative. *Harper & Row*, 471 U.S. at 550 (fair use precludes a superseding use of
 16 the original). Arista has used and continues to use Cisco’s copyrighted works¹ in the same type of
 17 software as Cisco (a network device operating system), with the same type of hardware as Cisco
 18 (network devices), to perform the same functions as Cisco (routing and switching), and sells to
 19 customers in the same or similar ways as Cisco. Thus, Cisco’s copyrighted works and Arista’s
 20 infringing EOS operating system are used for the same purpose. *See, e.g., Wall Data v. Los
 21 Angeles County Sheriff’s Dept.*, 447 F.3d 769, 778 (9th Cir. 2006) (“In cases where use is for the
 22 same intrinsic purpose as [the copyright holder’s] . . . such use seriously weakens a claimed fair
 23 use.”) (internal citations and quotation marks omitted). And if a customer purchases a switch or
 24 router from Arista with EOS, they have no reason to buy Cisco’s switch or router running Cisco’s
 25 IOS copyrighted works, which is a classic “superseding use.” *Campbell v. Acuss-Rose Music*.

26
 27 ¹ “Cisco copyrighted works” and “Cisco’s copyrighted works” includes the copyrighted
 28 operating systems and related documents, as set forth and defined in Paragraph 25 of the Second
 Amended Complaint.

1 As a result, and consistent with Arista’s copying of Cisco’s CLI, significant portions of Arista’s
 2 documentation are substantially similar to and in many instances precisely the same as Cisco IOS
 3 documentation. In light of the foregoing and the numerous instances of copying described in
 4 Cisco’s responses to Interrogatory Nos. 2, 3, 16, and 18, which are incorporated by reference
 5 herein, Arista’s copying also is quantitatively significant. Furthermore, Cisco’s calculation of the
 6 entire quantitative nature of Arista’s copying is ongoing and also is subject to expert discovery.

7 **(4) *the effect of the use upon the potential market for or value of the copyrighted***
 8 ***work.***

9 The inquiry under the fourth fair use factor includes “harm to the original [and] ...
 10 derivative works,” *Harper & Row*, 471 U.S. at 568; *see* 17 U.S.C. § 106(2) (exclusive statutory
 11 right “to authorize ... derivative works based upon the copyrighted work”), and the effect on the
 12 potential market if the challenged use “become[s] widespread.” *Harper & Row*, 471 U.S. at 568.
 13 Here, Arista’s use affects all of these actual and potential markets as it directly competes with
 14 Cisco for sales of products that incorporate and use Cisco’s copyrighted works—switches and
 15 routers. The copyrighted works at issue—Cisco’s operating systems and accompanying
 16 documents—allow the switches and routers to work, and the command line interfaces that are the
 17 heart and soul of the operating systems allow for the configuration of the switches and routers so
 18 that they can function properly. Arista markets and sells its products that incorporate and use
 19 Cisco’s copyrighted works in order to supplant and replace Cisco in the marketplace. Thus, if
 20 Arista’s infringement is permitted to continue, it will substantially impact Cisco’s market.

21 As further evidence of the impact to the market, Cisco has suffered and will suffer
 22 irreparable harm and damage as a direct result of Arista’s choice to copy Cisco’s copyrighted
 23 works and then directly compete with Cisco in the marketplace. Cisco has lost sales and
 24 customers and will continue to do so. Cisco has suffered harm to its reputation as an innovator in
 25 the industry and will continue to suffer such harm if Arista’s infringement is permitted to
 26 continue. Further, Arista’s copying—and its decision to publicly brag that it copied Cisco and tout
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- Deposition Testimony of HP Corporate Representative Tr. at 110:24-112:7 (May 2, 2016).
- Deposition Testimony of Sweeney Deposition Tr. at 416:12-15, 452:3-12.
- Deposition Testimony of Giancarlo
- Deposition Testimony of Bechtolsheim Deposition Rough Tr. at pp. 47:14-50:1
- Deposition Testimony of Sadana Deposition, Exhibit 382
- http://www.cisco.com/c/en/us/products/collateral/ios-nx-os-software/nx-os-software/data_sheet_c78-652063.pdf
- <https://www.arista.com/en/products/eos>
- Cisco’s Responses, supplements, and exhibits to Interrogatory Nos. 16, 19, and 21
- Arista, *EOS: An Extensible Operating System*.
- See, e.g., Business Insider, “Cisco Just Fired Another Shot At Its Hated Rival, An Upstart Formed by Ex-Cisco Employees,” Dec. 19, 2014, available at <http://www.businessinsider.com/cisco-justfied-another-shot-at-arista-2014-12>;
- New York Times, “Arista’s Chief Executive Counters Cisco Lawsuit,” Dec. 10, 2014, available at http://bits.blogs.nytimes.com/2014/12/10/aristas-chiefexecutive-counters-cisco-lawsuit/?_r=0.
- QuestNET Conference July 2013, slide 38.
- Arista’s responses (and all supplements thereto) to Cisco’s Interrogatory No. 10.

HIGHLY CONFIDENTIAL—ATTORNEYS' EYES ONLY

Cisco's investigation of the subject matter of this interrogatory is ongoing. Cisco therefore reserves the right to supplement this response as additional information becomes available, including information that may be the subject of expert testimony and expert discovery.

INTERROGATORY NO. 24:

For each CLI Command, mode, hierarchy, prompt, or command response that YOU contend Arista unlawfully copied, identify each and every asserted copyright-registered work in which such CLI Command, mode, hierarchy, prompt, or command response appears, including the registration number for the copyrighted work, the title of the registered computer code and the accompanying documentation, and the Bates number for the page of the filed deposit where the command appears in the copyright-registered work.

RESPONSE TO INTERROGATORY NO. 24:

Cisco incorporates by reference its General Objections as though fully set forth herein.

1 Cisco further objects to this interrogatory to the extent that it is cumulative and duplicative
 2 of other discovery sought by Arista. Cisco also objects to this interrogatory as compound and
 3 unduly burdensome, as it calls for numerous pieces of information. Cisco further objects to this
 4 interrogatory as overbroad and unduly burdensome to the extent that it seeks information that is
 5 neither relevant to any claim or defense in this litigation nor reasonably likely to lead to the
 6 discoverability of admissible evidence. Cisco also objects to this interrogatory as undefined,
 7 vague, ambiguous, overbroad, and unduly burdensome in its use of the terms “appears” and
 8 “accompanying documentation.” Cisco further objects to this interrogatory to the extent it seeks
 9 information that is protected by the attorney-client privilege, that constitutes attorney work
 10 product, or that is protected by any other applicable privilege, protection, or immunity.

11 Subject to and without waiver of the foregoing general and specific objections, Cisco
 12 responds as follows:

13 Cisco has already provided information responsive to this interrogatory to Arista in its
 14 responses to other interrogatories. Cisco incorporates by reference herein the operative complaint
 15 in this case and all documents cited therein. Cisco furthermore incorporates by reference herein its
 16 Responses to Interrogatory Nos. 2, 16, and 18.

17 Because the burden of locating the information sought by this interrogatory is the same for
 18 Arista as it is for Cisco, pursuant to Fed. R. Civ. P. 33(d), Cisco identifies the documents cited and
 19 referenced in Cisco’s Responses to Interrogatory Nos. 2, 16, and 18, as well as the documents
 20 cited and referenced in Cisco’s operative complaint and the exhibits thereto.

21 Cisco’s investigation is ongoing. Cisco will supplement its response to this interrogatory
 22 based on its further investigation and based on expert discovery.

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24 **CORRECTED SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 24:**

25 Subject to and without waiver of its general and specific objections, Cisco further responds
 26 as follows:

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1 Cisco objects to the terms “modes, hierarchies, prompts, responses” as vague, ambiguous,
 2 and overbroad, and to the extent that these terms call for expert opinion or legal conclusions.

3 Because the burden of locating the information sought by this interrogatory is the same for
 4 Arista as it is for Cisco, pursuant to Fed. R. Civ. P. 33(d), Cisco identifies the documents cited and
 5 referenced in Cisco’s Responses to Interrogatory Nos. 2, 6, 16, 18 and 19, as well as the
 6 documents cited and referenced in Cisco’s operative complaint and the exhibits thereto. Cisco
 7 additionally identifies the following previously-produced business records from which this
 8 information can be derived:

Registered Work	Registration No.	Related Documents
Cisco IOS 11.0	TXu 1-036-057	CSI-CLI-00356391 - CSI-CLI-00356394; CSI-CLI-00356395 - CSI-CLI-00356398; CSI-CLI-00403865; Source Code
Cisco IOS 11.1	TX 5-531-435; TXu1-048-569	CSI-CLI-00356385 - CSI-CLI-00356388; CSI-CLI-00356588 - CSI-CLI-00356591; CSI-CLI-00356500 - CSI-CLI-00356501; CSI-CLI-00356562 - CSI-CLI-00356563 CSI-CLI-00403866; Source Code
Cisco IOS 11.2	TXu1-036-063	CSI-CLI-00356578 - CSI-CLI-00356581; CSI-CLI-00356496 - CSI-CLI-00356499; CSI-CLI-00403867; Source Code
Cisco IOS 11.3	TXu1-036-062; TXu1-057-804	CSI-CLI-00356538 - CSI-CLI-00356541; CSI-CLI-00356446 - CSI-CLI-00356549; CSI-CLI-00356582 - CSI-CLI-00356587; CSI-CLI-00356576 - CSI-CLI-00356577; CSI-CLI-00403868; Source Code

1 Registered Work	2 Registration No.	3 Related Documents
2 Cisco IOS 12.0	3 TXu1-036-064; 4 TXu1-057-805	5 CSI-CLI-00356520 - CSI-CLI-00356523; 6 CSI-CLI-00356516 - CSI-CLI-00356519; 7 CSI-CLI-00356550 - CSI-CLI-00356555; 8 CSI-CLI-00356484 - CSI-CLI-00356485; 9 CSI-CLI-00403869; Source Code
7 Cisco IOS 12.1	8 TXu1-036-066; 9 TXu1-057-807	10 CSI-CLI-00356512 - CSI-CLI-00356515; 11 CSI-CLI-00356572 - CSI-CLI-00356575; 12 CSI-CLI-00356490 - CSI-CLI-00356495; 13 CSI-CLI-00356506 - CSI-CLI-00356507; 14 CSI-CLI-00403870; Source Code
12 Cisco IOS 12.2	13 TXu1-036-065; 14 TXu1-057-806	15 CSI-CLI-00356508 - CSI-CLI-00356511; 16 CSI-CLI-00356568 - CSI-CLI-00356571; 17 CSI-CLI-00356556 - CSI-CLI-00356561; 18 CSI-CLI-00356536 - CSI-CLI-00356537; 19 CSI-CLI-00403871; Source Code
17 Cisco IOS 12.3	18 TXu1-188-975	19 CSI-CLI-00356524 - CSI-CLI-00356527; 20 CSI-CLI-00356524 - CSI-CLI-00356527; 21 CSI-CLI-00403872; CSI-CLI-00403874; Source Code
21 Cisco IOS 12.4	22 TXu1-259-162	23 CSI-CLI-00356486 - CSI-CLI-00356489; 24 CSI-CLI-00356705 - CSI-CLI-00356708; 25 CSI-CLI-00403873; Source Code
24 Cisco IOS 15.0	25 TX 7-938-524	26 CSI-CLI-00356480 - CSI-CLI-00356483; CSI-CLI- 00356564 - CSI-CLI-00356567; 27 CSI-CLI-00054598 - CSI-CLI-00351948; Source Code

Registered Work	Registration No.	Related Documents
Cisco IOS 15.1	TX 7-938-525	CSI-CLI-00356502 - CSI-CLI-00356505; CSI-CLI-00356532 - CSI-CLI-00356535; CSI-CLI-00034689 - CSI-CLI-00354832; Source Code
Cisco IOS 15.2	TX 7-937-159	CSI-CLI-00356528 - CSI-CLI-00356531; CSI-CLI-00356697 - CSI-CLI-00356700; CSI-CLI-00024968 - CSI-CLI-00294561; Source Code
Cisco IOS 15.4	TX 7-938-341	CSI-CLI-00356657 - CSI-CLI-00356660; CSI-CLI-00356653 - CSI-CLI-00356656; CSI-CLI-00074114 - CSI-CLI-00332892; Source Code
Cisco IOS XR 3.0	TXu1-237-896	CSI-CLI-00356665 - CSI-CLI-00356668; CSI-CLI-00356618 - CSI-CLI-00356621; CSI-CLI-00359263 - CSI-CLI-00362850; Source Code
Cisco IOS XR 3.2	TXu1-270-592	CSI-CLI-00356661 - CSI-CLI-00356664; CSI-CLI-00356701 - CSI-CLI-00356704; CSI-CLI-00362851 - CSI-CLI-00370474; Source Code
Cisco IOS XR 3.3	TXu1-336-997	CSI-CLI-00356689 - CSI-CLI-00356692; CSI-CLI-00356642 - CSI-CLI-00356645; CSI-CLI-00370475 - CSI-CLI-00380671; Source Code

1	Registered Work	Registration No.	Related Documents
2	Cisco IOS XR 3.4	TXu1-344-750	CSI-CLI-00356634 - CSI-CLI-00356637; CSI-CLI-00356638 - CSI-CLI-00356641; CSI-CLI-00380672 - CSI-CLI-00389726; Source Code
6	Cisco IOS XR 3.5	TXu1-592-305	CSI-CLI-00356685 - CSI-CLI-00356688; CSI-CLI-00356614 - CSI-CLI-00356617; CSI-CLI-00389728 - CSI-CLI-00403864; Source Code
10	Cisco IOS XR 4.3	TX 7-933-364	CSI-CLI-00356681 - CSI-CLI-00356684; CSI-CLI-00356649 - CSI-CLI-00356652; CSI-CLI-00099911 - CSI-CLI-00173412; Source Code
14	Cisco IOS XR 5.2	TX 7-933-353	CSI-CLI-00356626 - CSI-CLI-00356629; CSI-CLI-00356602 - CSI-CLI-00356605; CSI-CLI-00110638 - CSI-CLI-00191711; Source Code
18	Cisco IOS XE 2.1	TX 7-937-240	CSI-CLI-00356693 - CSI-CLI-00356696; CSI-CLI-00356606 - CSI-CLI-00356609; CSI-CLI-00229755 - CSI-CLI-00325496; Source Code
22	Cisco IOS XE 3.5	TX 7-937-234	CSI-CLI-00356610 - CSI-CLI-00356613; CSI-CLI- 00356630 - CSI-CLI-00356633; CSI-CLI-00180764 - CSI-CLI-00313894; Source Code
25	Cisco NX-OS 4.0	TX 7-940-713	CSI-CLI-00356646 - CSI-CLI-00356648; CSI-CLI-00356622 - CSI-CLI-00356625; CSI-CLI-00054566 - CSI-CLI-00054597;

1 Registered Work	2 Registration No.	3 Related Documents
4	5	6 CSI-CLI-00191712 - CSI-CLI-00207082; Source 7 Code
8 Cisco NX-OS 5.0	9 TX 7-940-718	10 CSI-CLI-00356599 - CSI-CLI-00356601; 11 CSI-CLI-00356677 - CSI-CLI-00356680; 12 CSI-CLI-00173413 - CSI-CLI-00216955; Source 13 Code
14 Cisco NS-OX 5.2	15 TX 7-940-727	16 CSI-CLI-00356596 - CSI-CLI-00356598; 17 CSI-CLI-00356673 - CSI-CLI-00356676; 18 CSI-CLI-00176460 - CSI-CLI-00202928; Source 19 Code
20 Cisco NS-OX 6.2	21 TX 7-940-722	22 CSI-CLI-00356593 - CSI-CLI-00356595; 23 CSI-CLI-00356669 - CSI-CLI-00356672; 24 CSI-CLI-00178218 - CSI-CLI-00216925; Source 25 Code

16
17 Cisco's investigation of the subject matter of this interrogatory is ongoing. Cisco therefore
18 reserves the right to supplement this response as additional information becomes available,
19 including information that may be the subject of expert testimony and expert discovery.
20
21

22 **INTERROGATORY NO. 25:**

23 For each copyright-registered work that Cisco alleges Arista unlawfully copied, identify
24 the total number of commands, modes, hierarchies, prompts, responses, and lines of software code
25 in the work.
26
27

1 **RESPONSE TO INTERROGATORY NO. 25:**

2 Cisco incorporates by reference its General Objections as though fully set forth herein.

3 Cisco further objects to this interrogatory to the extent that it is cumulative and duplicative
 4 of other discovery sought by Arista. Cisco also objects to this interrogatory as compound and
 5 unduly burdensome, as it calls for numerous pieces of information. Cisco further objects to this
 6 interrogatory as overbroad and unduly burdensome to the extent that it seeks information that is
 7 neither relevant to any claim or defense in this litigation nor reasonably likely to lead to the
 8 discoverability of admissible evidence. Cisco further objects to this interrogatory to the extent it
 9 seeks information that is protected by the attorney-client privilege, that constitutes attorney work
 10 product, or that is protected by any other applicable privilege, protection, or immunity.

11 Subject to and without waiver of the foregoing general and specific objections, Cisco
 12 responds as follows:

13 Cisco has already provided information responsive to this interrogatory to Arista in its
 14 complaint and in its responses to other interrogatories. Cisco therefore incorporates by reference
 15 herein the operative complaint in this case and all documents cited therein. Cisco furthermore
 16 incorporates by reference herein its Responses to Interrogatory Nos. 2, 16, and 18.

17 Because the burden of locating the information sought by this interrogatory is the same for
 18 Arista as it is for Cisco, pursuant to Fed. R. Civ. P. 33(d), Cisco identifies the documents cited and
 19 referenced in Cisco's Responses to Interrogatory Nos. 2, 16, and 18, as well as the documents
 20 cited and referenced in Cisco's operative complaint and the exhibits thereto.

21 Cisco's investigation is ongoing. Cisco will supplement its response to this interrogatory
 22 based on its further investigation and based on expert discovery.

23

24 **CORRECTED SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 25:**

25 Subject to and without waiver of its general and specific objections, Cisco further responds
 26 as follows:

27

28

1 Cisco objects to the terms “modes, hierarchies, prompts, responses” as vague, ambiguous,
 2 and overbroad, and to the extent that these terms call for expert opinion or legal conclusions.

3 Because the burden of locating the information sought by this interrogatory is the same for
 4 Arista as it is for Cisco, pursuant to Fed. R. Civ. P. 33(d), Cisco identifies the documents cited and
 5 referenced in Cisco’s Responses to Interrogatory Nos. 2, 7, 16, 18, and 24, as well as the
 6 documents cited and referenced in Cisco’s operative complaint and the exhibits thereto. Cisco
 7 additionally identifies the following previously-produced business records from which this
 8 information can be derived:

Registered Work	Registration No.	Related Documents
Cisco IOS 11.0	TXu 1-036-057	CSI-CLI-00403865; Source Code
Cisco IOS 11.1	TX 5-531-435; TXu1-048-569	CSI-CLI-00403866; Source Code
Cisco IOS 11.2	TXu1-036-063	CSI-CLI-00403867; Source Code
Cisco IOS 11.3	TXu1-036-062; TXu1-057-804	CSI-CLI-00403868; Source Code
Cisco IOS 12.0	TXu1-036-064; TXu1-057-805	CSI-CLI-00403869; Source Code
Cisco IOS 12.1	TXu1-036-066; TXu1-057-807	CSI-CLI-00403870; Source Code
Cisco IOS 12.2	TXu1-036-065; TXu1-057-806	CSI-CLI-00403871; Source Code
Cisco IOS 12.3	TXu1-188-975	CSI-CLI-00403872; CSI-CLI-00403874; Source Code
Cisco IOS 12.4	TXu1-259-162	CSI-CLI-00403873; Source Code
Cisco IOS 15.0	TX 7-938-524	CSI-CLI-00054598 - CSI-CLI-00351948; Source Code

Registered Work	Registration No.	Related Documents
Cisco IOS 15.1	TX 7-938-525	CSI-CLI-00034689 - CSI-CLI-00354832; Source Code
Cisco IOS 15.2	TX 7-937-159	CSI-CLI-00024968 - CSI-CLI-00294561; Source Code
Cisco IOS 15.4	TX 7-938-341	CSI-CLI-00074114 - CSI-CLI-00332892; Source Code
Cisco IOS XR 3.0	TXu1-237-896	CSI-CLI-00359263 - CSI-CLI-00362850; Source Code
Cisco IOS XR 3.2	TXu1-270-592	CSI-CLI-00362851 - CSI-CLI-00370474; Source Code
Cisco IOS XR 3.3	TXu1-336-997	CSI-CLI-00370475 - CSI-CLI-00380671; Source Code
Cisco IOS XR 3.4	TXu1-344-750	CSI-CLI-00380672 - CSI-CLI-00389726; Source Code
Cisco IOS XR 3.5	TXu1-592-305	CSI-CLI-00389728 - CSI-CLI-00403864; Source Code
Cisco IOS XR 4.3	TX 7-933-364	CSI-CLI-00099911 - CSI-CLI-00173412; Source Code
Cisco IOS XR 5.2	TX 7-933-353	CSI-CLI-00110638 - CSI-CLI-00191711; Source Code
Cisco IOS XE 2.1	TX 7-937-240	CSI-CLI-00229755 - CSI-CLI-00325496; Source Code
Cisco IOS XE 3.5	TX 7-937-234	CSI-CLI-00180764 - CSI-CLI-00313894; Source Code

1 Registered Work	2 Registration No.	3 Related Documents
4 Cisco NX-OS 4.0	5 TX 7-940-713	6 CSI-CLI-00054566 - CSI-CLI-00054597; CSI-CLI-00191712 - CSI-CLI-00207082; Source Code
7 Cisco NX-OS 5.0	8 TX 7-940-718	9 CSI-CLI-00173413 - CSI-CLI-00216955; Source Code
10 Cisco NS-OX 5.2	11 TX 7-940-727	12 CSI-CLI-00176460 - CSI-CLI-00202928; Source Code
13 Cisco NS-OX 6.2	14 TX 7-940-722	15 CSI-CLI-00178218 - CSI-CLI-00216925; Source Code

16
17 Cisco's investigation of the subject matter of this interrogatory is ongoing. Cisco therefore
18 reserves the right to supplement this response as additional information becomes available,
19 including information that may be the subject of expert testimony and expert discovery.
20
21

22 DATED: June 3, 2016

23 Respectfully submitted,

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PROOF OF SERVICE

I hereby certify that, at the date entered below, I caused a true and correct copy of the foregoing to be served by transmission via the email addresses below:

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I declare under penalty of perjury that the foregoing is true and correct. Executed on June 3, 2016, at San Francisco, California.

/s/ Catherine R. Lacey

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